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June 14, 2021

**Via ECF**

The Honorable Claire C. Cecchi, U.S.D.J.  
United States District Court  
Martin Luther King, Jr. Federal Building & U.S. Courthouse  
50 Walnut Street  
Newark NJ 07101

***Re: IQVIA Inc. v. Veeva Systems, Inc.***  
***Civil Action 2:17-cv-00177-CCC-MF***

Dear Judge Cecchi:

We, along with co-counsel Quinn Emanuel, Urquhart & Sullivan, LLP, represent Plaintiff IQVIA Inc. in the above-referenced matter (“IQVIA”). We write to request an extension of the time to file IQVIA’s oppositions to Veeva Systems Inc.’s (“Veeva”): (1) Brief in Support of its Objections to the Special Discovery Master’s Order, of May 7, 2021, Overruling Veeva’s Assertion of Attorney Client Privilege; and (2) Brief in Support of its Objections to the Special Discovery Master’s Order, of May 7, 2021, Recommending Sanctions (“Veeva’s Appeal Briefs”). Veeva filed its Appeal Briefs on June 4, 2021, after requesting and receiving an extension from the Court on the due date for those Appeal Briefs. IQVIA consented to Veeva’s extension request.

To be clear, on June 4, 2021, Veeva filed not one, but two, appeals. (*See* ECF Nos. 353-356). Veeva filed sixty pages of briefing, and attached over 100 exhibits. (*See* ECF Nos. 353-356). After reviewing the Appeal Briefs, and the voluminous exhibits attached thereto, IQVIA requested that Veeva consent to a 30-day extension for the filing of IQVIA’s oppositions—from June 22, 2021 to July 22, 2021. Veeva refused to provide this consent, instead stating that it would agree only to a two-week extension of the opposition deadline, which would result in IQVIA’s oppositions being due on July 6, 2021, immediately following the holiday weekend.

IQVIA now asks the Court to approve IQVIA’s extension request, which will result in IQVIA’s oppositions to Veeva’s Appeal Briefs being due on July 22, 2021. Such an extension is appropriate given the scope of Veeva’s Appeal Briefs and the time needed for IQVIA to effectively prepare its oppositions to Veeva’s voluminous filings, which appeal the Special Discovery Master’s 115-page order and opinion ( ECF No. 349). This is the first extension IQVIA has requested for the filing of its oppositions to Veeva’s Appeal Briefs.

An additional two weeks beyond Veeva’s proposed deadline will not prejudice the

parties, especially given that several other previously-filed Veeva appeals are pending. Moreover, such an extension is equitable, as IQVIA agreed—and has historically agreed—to Veeva's numerous requests for extensions in the past, and would have consented to a 30-day extension in this instance, had Veeva requested one.

A proposed order is enclosed. We thank the Court for its consideration of this matter.

Very truly yours,

/s/ Amy Luria  
Amy Luria